

Consultation Response

IGT159: Amendments to the Must Read Process

Responses invited by: 20 Sep 2020

Respondent Details

Name: Cher Harris

Organisation: Indigo Pipelines Ltd

Support Implementation ☒ Y

Qualified Support ☐

Neutral ☐

Do Not Support ☐

Please briefly summarise the key reason(s) for your support / opposition

We are in general support the desire to streamline the Must Read process. Specifically, we would like to see the IGT Must Read 'pot' being regularly refreshed by CDSP. We support excluding AMR and SMART/DCC Active sites, in alignment with the UNC process for Large Transporter sites. We agree that for sites gained via the SOLR process, Shippers should be given extra time to obtain a meter reading. We also support the temporary exclusion of sites with known issues that prevent a meter reading being obtained, with oversight from PAC of these 'paused' sites to ensure the issues are resolved in a timely manner.

Self-Governance Statement

Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?

We accept the proposer's suggestion that this Modification should be subject to Authority consent

Please state any new or additional issues that you believe should be considered

The proposal states that site visit information, relating to a fault with or concerns about the meter, should be recorded and reported. Consideration should also be given to reporting on readings obtained by the IGT but rejected by CDSP. Recent analysis of CDSP rejection of Indigo Pipelines Must Reads has shown that 50% of rejected reads are from properties that have been visited 2 or more times in the past 12 months for the purpose of obtaining a Must Reads. The readings obtained each time are sequential and appear to validate each other as correct. These readings are not currently being passed to the Shipper to enable them to investigate and update CDSP as necessary. The MPRN falls back into the Must Read 'pot' requiring the IGT to continually visit the same property every 4 months.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

Objective F would be positively impacted by improved definition of the Must Read process in Code. There may be a benefit to Shippers in the alignment of IUNC and UNC, although the effect would be negligible for IGTs.

Impacts and Costs

What development and ongoing costs would you face if this modification was implemented?

None identified

Implementation

What lead time would you wish to see prior to this modification being implemented, and why?

The Modification could be implemented in the next Release after Authority approval, however as most of the system changes will be made to the CDSP systems, we recommend that the implementation date is coordinated with the CDSP solution delivery.

Legal Text

Are you satisfied that the legal text will deliver the intent of the modification?

We are satisfied with the legal text

Further Comments

Should a reciprocal arrangement be added into the business rules, and therefore the Legal Drafting, for the CDSP to notify an IGT where a Shipper has identified a known issue. *(Please see "Panel Discussions" in Section 10 of the [Draft Modification Report](#) for further context and information)*

No. Where an issue has been flagged by the Shipper, the CDSP should remove the MPRN from the Must Read 'pot' prior to issuing it to the IGT. If the issue is flagged after the CDSP has issued the MPRN to the IGT, the IGT may not be able to recall it from the meter reader, so if a reading is obtained the IGT must be allowed to charge for it as normal.

Further Comments

Is there anything further you wish to be taken into account?

No further comments

Responses should be submitted by email to IGTUNC@gemserv.com